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## MEMO ENDORSED

May 16, 2024

Via ECF

Hon. Andrew L. Carter, Jr. United States District Court Southern District of New York United States Courthouse 40 Foley Square, Room 435 New York, NY 10007

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Re: Fourth Consent Request to Stay All Case Deadlines

Winston v. Peacock TV LLC, Case No. 1:23-cv-08191-ALC

Dear Judge Carter:

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Local Rule 7.1(d), and the Court's Individual Practices, Defendant Peacock TV LLC ("Defendant") and Plaintiff Holly Winston ("Plaintiff") (jointly, the "Parties"), seek an additional 30-day stay of all case deadlines, through and including June 19, 2024, while the Parties finalize the details of a tentative settlement agreement reached during mediation on March 11, 2024.

On December 22, 2023, the Parties requested a 60-day stay of all case deadlines, including Defendant's deadline to respond to Plaintiff's Complaint, while the Parties explored the possibility of a resolution to this matter (ECF No. 10). On January 4, 2024, the Court granted the 60-day stay through and including February 20, 2024 (ECF No. 11). On February 16, 2024, the Parties requested an additional 45-day stay to allow for the scheduled mediation on March 11, 2024 (ECF No. 12), and the Court granted this request on February 21, 2024 (ECF No. 13). On April 1, 2024, the Parties requested an additional 45-day stay to prepare a settlement agreement memorializing the tentative agreement reached during mediation (ECF No. 14), and the Court granted this request on April 19, 2024 (ECF No. 17). The Parties believe that judicial economy and the interests of the Parties would be served by an additional 30-day stay of the action while the Parties finalize the details of the settlement agreement.

The Court has not yet issued a scheduling order, and this requested 30-day stay of all case deadlines does not affect any other dates.

Sincerely,

By: <u>/s/ Jeffrey Landis</u>
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CC: All counsel of record (via ECF)

MON. ANDREW L. CARTER, JR.

May 30, 2024

New York, New York

UNITED STATES DISTRICT JUDGE